

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,  
Plaintiff,

V.

HECTOR MARIO LOPEZ-FRANCO,  
Defendant.

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CRIMINAL NO. 99-310 (JAF)

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**MOTION FOR EARLY TERMINATION  
(Re: Term of Supervised Release)**

TO THE HONORABLE JOSE A. FUSTE  
UNITED STATES CHIEF JUDGE  
FOR THE DISTRICT OF PUERTO RICO

COMES NOW defendant Hector Mario López-Franco (“López”) through the undersigned counsel and before this Honorable Court respectfully alleges and prays as follows:

**I. Introduction.**

On September 9, 1999, the Court entered an Order, appointing the Federal Public Defender. Docket Entry No. 4. On May 16, 2000, defendant López was sentenced to a term of imprisonment of thirty seven months, and a Supervised Release Term of four years, plus a Special Monetary Assessment of \$100.00. Docket Entry No. 20. The Court recommended that defendant López be allowed to participate in a substance abuse program, and Shock Incarceration Program. On or about October 2002, defendant López was placed on supervised release for the aforementioned period. His term of supervised release is expected to end on or about October, 2006.

**II. Relief Sought.**

Defendant López respectfully requests to be discharged from supervision.

**III. Basis for Relief.**

The Court may, after considering the factors set forth in 18, U.S.C., §3553(a), terminate a term of supervised release and discharge the defendant released at any time after the expiration of

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one year of supervised release if it is satisfied that such action is warranted by the conduct of the defendant released and the interest of justice. *See*, 18 U.S.C. §3583(e)(1). Defendant López has complied with the rules and regulations of supervised release, and is no longer in need of supervision. Furthermore, defendant López wishes to travel to Colombia during the month of February, 2006, to attend his daughter's fifteenth birthday, without burdening the Court with a request for travel outside United States jurisdiction.

**IV. Conclusion.**

For these reasons the defendant very respectfully requests that the Court terminate the term of supervised release, and discharge him from supervision.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, on this 17<sup>th</sup> day of June, 2005.

**JOSEPH C. LAWS, JR.**  
Federal Public Defender  
District of Puerto Rico

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*S/Carlos A. Vázquez-Alvarez*  
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**CERTIFICATE OF SERVICE**

**I CERTIFY** that on this date, I served a copy of the foregoing motion on counsel for the government, U.S. Attorney Humberto García via CM/ECF, and to the U.S. Probation Office at the Federico Degetau (Federal) Building, Room 400, Carlos Chardón Avenue, Hato Rey, Puerto Rico.

*S/Carlos A. Vázquez-Alvarez*  
CARLOS A. VAZQUEZ ALVAREZ